

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Michael Blair Debtor	Chapter 13 Proceeding 16-15389 ELF
Michael Blair Movant v. WELLS FARGO BANK, N.A. Respondent	

**LIMITED RESPONSE TO
DEBTOR'S MOTION FOR AUTHORITY TO SELL REAL PROPERTY**

AND NOW, comes WELLS FARGO BANK, N.A. (Respondent) by and through its counsel, POWERS KIRN, LLC, (Jill Manuel-Coughlin, on behalf of the firm), and hereby Objects/Responds to Debtor's Motion for Authority to Sell Real Property and avers the following:

1. Respondent is the holder of a mortgage on the property located at 3574 East Thompson Street, Philadelphia, PA 19134, which was recorded on 5/24/1999, at Book 1993; Page 583.
2. Respondent respectfully requests to be paid in full on its mortgage via wire transfer payment within 48 hours of the closing. The Payoff Figure used at the time of closing must be dated no longer than thirty (30) Days prior to the closing date.
3. Respondent further respectfully requests that the closing date be completed within 90 days from the entry of the order approving said sale.
4. Further, any Sale short of a full payoff will be subject to Respondent's final approval

WHEREFORE, Respondent respectfully requests the Honorable Court ORDER:

The Debtor's Motion for Authority to Sell Real Property relating to the property located at 3574 East Thompson Street, Philadelphia, PA 19134 is hereby approved conditioned on the following:

- (a) The sale of the property shall be completed within 90 days from the order entered approving the sale;
- (b) Respondent's mortgage lien shall be paid in full from the sale proceeds subject to a proper payoff quote, funds are to be wired to Respondent within 48 hours of closing; and
- (c) Any Sale short of a full payoff will be subject to Respondent's final approval.

Date: November 27, 2019

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

/s/ Jill Manuel-Coughlin, Esquire

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